UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

August 28, 2009

Bill Queen, District Ranger
Lookout Mountain RD
3160 NE 3rd Street
Prineville, Oregon 97754

Subject: **Comments on Big Summit Cluster Allotment Management Plans**
EPA Project Number: 09-039-AFS

Dear Mr. Queen:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (DEIS) for the proposed **Big Summit Cluster Allotment Management Plans** (CEQ # 20090239) on Look Out Mountain Ranger District of Ochoco National Forest (ONF) in Crook County, OR. The National Environmental Policy Act (NEPA) and Clean Air Act § 309 require EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS evaluates potential environmental impacts of a proposal to reauthorize cattle grazing in Big Summit Cluster Allotments on the Ranger District where there is demand for livestock forage and stream shade and bank stability improvements are needed. The project area would be 50,359 acres and involve five allotments, subdivided into 19 pastures. Analysis of the project's potential impacts considered 3 alternative actions, including a *Preferred Alternative* (Proposed Action and Alternative 2). Under this Alternative 2, the Forest Service (FS) would allow cattle grazing on the allotments and modify existing grazing practices to improve resource conditions in the project area. Active and adaptive grazing management strategies would also be used to move resources to desired future conditions.

EPA supports the overall purpose of the project to allocate forage for livestock grazing, while improving range conditions, particularly in riparian areas. We also support use of adaptive grazing management strategy when it includes clearly defined and realistically achievable objectives, monitoring to assess progress towards achieving the objectives, and the flexibility to adjust grazing use when monitoring reveals unsatisfactory effects.

Our concerns with potential implementation of the Preferred Alternative as currently proposed relate to its potential impacts to water quality within five streams that are already on the Oregon State's most current 303(d) list and subsequent impacts to aquatic resources therein. We recommend that the FS continue to coordinate with the state Department of Environmental Quality (ODEQ) to ensure that the state water quality standards would be met by the project. The FS should also work with the Oregon Department of Fish and Wildlife (ODFW) to define

grazing practices that would be more protective of fishery resources within those water quality limited streams. In addition, we offer the attached detailed comments that we hope will be useful to you as you complete the NEPA analysis for the project.

Based on our review and concerns about water quality, we have assigned a rating of EC-2 (Environmental Concerns Insufficient Information) to the Preferred Alternative (Alternative 2). A copy of the rating system used in conducting our review is enclosed for your reference.

We appreciate the opportunity to review and comment on this draft EIS. If you would like to discuss our comments in detail, please contact Theogene Mbabaliye at (206) 553-6322 or me at (206) 553-1601.

Sincerely,

/s/
Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure
cc:
EPA Oregon Operations Office
Oregon Department of Environmental Quality
Oregon Department of Fish and Wildlife

EPA Detailed Comments on the Draft EIS for the Big Summit Cluster Allotment Management Plans

Water quality

Preventing water quality degradation is one of EPA's primary concerns. Section 303(d) of the Clean Water Act (CWA) requires the state of Oregon and authorized tribes to identify waterbodies that do not meet water quality standards and to develop water quality restoration plans to meet established water quality standards and associated beneficial uses. The draft EIS identifies five streams that are on the 303(d) list and states that the pollutant of concern is temperature. Temperature within the streams currently exceeds the average of the 7-day maximum temperature standard for rearing of 64.4^0 F or 18^0 C.

Since thermal modification is the primary cause of streams not supporting beneficial uses in the area, early actions to increase shade and cover to minimize thermal impacts to water quality within the creeks would be very useful for the project. EPA supports the strategy to use a grazing strategy that combines early season, rest-rotation grazing systems with fences and water developments. Active restoration projects and establishment of adequate buffer zones around affected streams would also help to improve water quality within impaired streams. We believe use of these techniques would improve riparian health and be consistent with water quality restoration plans such as the Total Maximum Daily Loads (TMDLs) for 303(d) listed water bodies in the project area. The grazing strategy would also reduce loading of fecal coliform and nutrients to waterways. Because these pollutants are usually associated with livestock grazing, we recommend that the final EIS include available information on bacteria and nutrients for streams in the project area, indicate the extent to which such pollutants would impact water quality within the streams, and what will be done to manage livestock and reduce impacts to water quality due to bacteria and nutrients.

Although some riparian areas in the project area will be restored, we are concerned about sites were continued livestock grazing is likely to further degrade streams through increased entrenchment due to streambank scouring, erosion, poor drainage and loss of soil and riparian vegetation. Stream degradation results in the transformation of healthy stream channels into Rosgens' F or G channels that have the potential to contribute significant sediment bedloads to the system, thus slowing the rate of water quality and stream health recovery. Because there are such stream channels in the project area, we believe that additional protection of certain riparian areas may be warranted, such as on Big Summit and Brush Creek Allotments and other areas where F and G channels are near high quality habitat(s), drinking water sources, and other sensitive resources. In such cases, we recommend that grazing exclusions be considered to move existing resource conditions toward desired future conditions more rapidly in high value riparian areas. Also, the proposed active restoration should target such areas to increase vegetation cover and improve thermal conditions of the stream channels.

Recreation

On many national forest land systems, recreational and off-road vehicle use has been increasing. If there will be potential effects or conflicts between livestock grazing and

recreational use of the analysis area, we recommend that the final EIS include information on possible conflicts between livestock and recreational users, plans to reduce the conflicts, and cumulative effects of off-road vehicle use, particularly near riparian areas and sensitive habitats.

Climate Change Effects

Currently, there are concerns that continued increases in greenhouse gas emissions resulting from human activities contribute to climate change. Effects of climate change may include changes in hydrology, sea level, weather patterns, precipitation rates, and chemical reaction rates. In particular, livestock grazing has the potential to sequester carbon, which helps to mitigate climate change effects (see Follett et al. (2001), *The potential of US grazing lands to sequester carbon and mitigate the greenhouse effect)*. As an example, converting from continuous to rotational grazing system may keep forage plants in an actively growing state, which would increase photosynthesis rates at higher levels and allow the forages to sequester more carbon. We encourage the FS to include a discussion on the effects of climate change in the final EIS to indicate how resources affected by climate change could potentially influence the proposed project and vice versa, especially within sensitive areas.

Coordination with Tribes

The draft EIS states that the planning team held consultations with the tribes, but information about the outcomes of these consultations was not included in the draft EIS. We recommend the final EIS discuss the process and outcomes of consultations with the tribes.